

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KARIN DUDZIENSKI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 07 C 3813
	)	
BCBG MAX AZRIA GROUP, INC. d/b/a	)	Judge Milton I. Shadur
BCBG Max Azria, BCBG MAX AZRIA	)	
HOLDINGS, INC. d/b/a BCBG Max Azria,	)	Magistrate Judge Morton Denlow
BCBG MAX AZRIA INTERNATIONAL	)	
HOLDINGS, INC. d/b/a BCBG Max Azria,	)	
and DOES 1-10,	)	
	)	
Defendants.	)	

**DECLARATION OF SCOT D. WILSON IN FURTHER SUPPORT OF BCBG'S  
MOTION TO TRANSFER**

I, Scot D. Wilson, hereby declare as follows:

1. I am an attorney in the law firm of Call, Jensen & Ferrell, A Professional Corporation and counsel for Defendants BCBG Max Azria Group, Inc., BCBG Max Azria Holdings, Inc., and BCBG Max Azria International Holdings, Inc. (collectively "BCBG") in the above-captioned action. I have personal knowledge of the facts set forth below and, if called upon to do so, I could and would testify competently thereto.

2. Following the status hearing regarding BCBG's pending motion to transfer venue on October 29, 2007, the Court issued a minute order requiring BCBG to: (1) designate a witness pursuant to Federal Rule of Civil Procedure 30(b)(6) as the person most qualified ("PMQ") to testify regarding the location of the witnesses; and (2) make the Rule 30(b)(6) PMQ available for deposition in Chicago, Illinois to be completed by November 15, 2007.

3. Both components of the Court's October 29th order have been satisfied.

4. **First**, BCBG designated Ajit Patel, Chief Information Officer for BCBG Max Azria Group, Inc., as the Rule 30(b)(6) witness and PMQ regarding the location of the witnesses.

5. **Second**, the deposition of BCBG's Rule 30(b)(6) witness was taken and completed on at the law firm of Schopf & Weiss LLP in Chicago, Illinois on November 9, 2007. A true and correct copy of the transcript from the deposition of Ajit Patel taken on November 9, 2007 is attached to the Motion for Leave to File Supplementary Declaration at Exhibit A.

6. In his deposition, Mr. Patel testified that he believed following persons were likely the most critical witnesses in this case:

<i>Name</i>	<i>Position</i>	<i>Relationship</i>	<i>Location</i>
Ajit Patel	<i>Chief Information Officer</i>	Current employee	Vernon, CA
Hamid Nehoray	<i>V.P., Information Systems</i>	Current employee	Vernon, CA
Steve Suarez	<i>Store Systems Manager</i>	Former employee	Los Angeles, CA
Bill Lucas	<i>Retail Systems Manager</i>	Former employee	Los Angeles, CA
Russell Bowers	<i>Retail Controller</i>	Former employee	Los Angeles, CA
Joe Hasenzahl	<i>Director of Retail Systems</i>	Former employee	Los Angeles, CA
Brian Fleming	<i>Chief Financial Officer</i>	Current employee	Vernon, CA
Billie Parsons	<i>V.P., Finance</i>	Current employee	Vernon, CA
Gregg Slepian	<i>SAP Retail Account Executive</i>	Triversity by SAP (non-party)	Phoenix, AZ
(Not mentioned)	<i>(Not referenced in deposition)</i>	Visa (non-party)	Foster City, CA
(Not mentioned)	<i>Software consultants</i>	NSB (non-party)	Canada

(See Exhibit A (Patel Depo. Tr., at \_\_\_\_)).

7. There are no third-party/non-party witnesses (e.g., former employees, vendors, suppliers, consultants, etc.) in Illinois. Furthermore, I am not even aware of any party-affiliated witnesses (other than Plaintiff Karin Dudzienski) that either party in this action would except to call as a witness at trial who live or work in Illinois.

I declare under penalty of perjury pursuant to the laws of the State of California and the United States that the foregoing is true and correct. Executed this 14th day of November, 2007, at Newport Beach, California.

  
Scot D. Wilson